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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS, INC., et al.,	:	Case No. 08-13555 (JMP)
	:	
Debtors.	:	Jointly Administered
	:	
-----X	:	

**STATEMENT OF RUSSELL INVESTMENT GROUP, INC. WITH RESPECT TO  
(I) MOTION OF HARBINGER FUNDS FOR LEAVE TO CONDUCT RULE 2004  
DISCOVERY OF DEBTOR LEHMAN BROTHERS HOLDINGS INC. AND  
(II) MOTION OF NEWPORT GLOBAL OPPORTUNITIES FUND L.P., ET AL.  
FOR LEAVE TO CONDUCT RULE 2004 DISCOVERY OF DEBTOR LEHMAN  
BROTHERS HOLDINGS INC. AND OTHER ENTITIES**

TO THE HONORABLE JAMES M. PECK, UNITED STATES BANKRUPTCY JUDGE

Russell Investment Group, Inc., Russell Investment Company Money Market Fund, and  
Russell Implementation Services, Inc. (collectively, the “Russell Funds”), substantial holders of short  
term commercial paper and corporate notes of Lehman Brothers Holdings Inc. (“LBHI”) and certain  
of its affiliates (collectively, the “Debtors”), by and through their undersigned counsel, in support of  
this statement (the “Statement”) with respect to (i) Motion of Harbinger Funds (“Harbinger”) for  
Leave to Conduct Rule 2004 Discovery of Debtor Lehman Brothers Holdings Inc. (the “Harbinger  
2004”) and (ii) Motion of Newport Global Opportunities Fund L.P., et al. (“Newport Global”) for  
Leave to Conduct Rule 2004 Discovery of Debtor Lehman Brothers Holdings Inc. and other Entities

(the “Newport Global 2004” and, together with the Harbinger 2004, the “2004 Motions”),  
respectfully represent as follows:

**STATEMENT**

1. By the 2004 Motions, Harbinger and the Newport Group (collectively, the “Movants”) seek information regarding the transfer of property between the Debtors and other affiliated non-Debtor entities in the period prior and subsequent to the Debtors’ bankruptcy filings. Specifically, the Movants seek, among other things, information related to (i) the alleged transfer of billions of dollars of cash from LBHI’s foreign affiliates to LBHI and the subsequent transfer of such cash elsewhere within the Lehman corporate structure and (ii) the alleged undisclosed transfer of other assets held directly or indirectly by LBHI to certain of its affiliates after the commencement of these cases. The Movants request that the Court direct discovery regarding such transfers in the form of (i) a deposition of Lehman Brothers Holdings Inc. and (ii) documentation production.

2. On October 10, 2008, an informal noteholder group filed a statement requesting that any and all documentation provided to the Movants in connection with the 2004 Motions be similarly provided to the informal noteholder group. The informal noteholder group also requested that it be allowed to participate in any deposition(s) scheduled in connection with the 2004 Motions and receive copies of any deposition transcripts.

3. The Russell Funds files this statement to make clear that, to the extent discovery is allowed to proceed regarding these very important issues, all documentation provided to the Movants and related deposition transcripts must be made public and readily available to all parties in interest.

**CONCLUSION**

For all of the foregoing reasons, the Russell Funds respectfully request that the Court (i) allow all parties in interest access to any and all discovery authorized by this Court in connection with the 2004 Motions, and (ii) grant any other relief as is just, proper and equitable.

DATED: October 13, 2008  
New York, New York

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